

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Connie Elaine Keys, Debtor

**Case No. 23-51141-KMS
CHAPTER 13**

RESPONSE

COMES NOW, Debtor, by and through counsel, and responds to Trustee's Motion to Dismiss (dk # 86) as follows:

1. Debtor commenced this case on August 15, 2023 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtor's employer has been deducting the plan payment from wages but failed to submit some of the deductions. The missing deductions were found and are being submitted to the Trustee's office.
3. Debtor can continue making the plan payments.

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Attorney for Debtor

Of Counsel:
Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on May 7, 2025, to:

By Electronic CM/ECF Notice:

Warren Cuntz

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.